

Before The  
POSTAL RATE COMMISSION  
WASHINGTON, D.C. 20268-0001

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Postal Rate and Fee Changes, 2000

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Docket No. R2000-1

RESPONSE OF THE UNITED STATES POSTAL SERVICE  
WITNESS RAYMOND TO ADVO INTERROGATORIES  
(ADVO/USPS-T13-111-113, 115, 118, 120-122)

The United States Postal Service hereby provides the response of witness Raymond to the following interrogatories of Advo, Inc.: ADVO/USPS-T13-111-113, 115, 118, 120-122, filed on March 30, 2000.

Each interrogatory is stated verbatim and is followed by the response.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

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May 18, 2000

**RESPONSE OF UNITED STATES POSTAL SERVICE WITNESS RAYMOND  
TO ADVO, INC. FOLLOW-UP INTERROGATORIES**

ADVO/USPS-T13-111. In response to MPA/USPS-T13-57, you state that, when the 6-minute beep occurred, the observer took an instant snapshot of the carrier's activity and scanned in the observation as soon as possible. On page 6 of your testimony, you state that your Stage 1 process design included a task inventory which included:

"1) Followed carriers from time of arrival at the station (clock-in) to end of the day (clock-out). Teams also traced routes from start to finish.

"2) Compiled a list of activities performed/route information and arranged the list into a hierarchy.

"3) Returned to the stations to follow carriers to insure the hierarchy reflected activities performed/route characteristics.

"4) Adjusted hierarchy and finalized flow-process charts with a data collection structure. Refer to Appendix A." (*Italics in original*)

..."The work sampling data identified the frequency of occurrence of an activity, which translated into the percent of time a carrier spent performing certain activities."

With respect to these "instants," activities, and hierarchy, please confirm the following or explain fully why you cannot and provide all corrections. If none of the following are correct, please explain fully how Appendix A of your testimony relates to your activity sampling data collection and your testimony.

(a) The list of activities and hierarchy to which you refer on page 6 are represented in Appendix A on page 17 of your testimony (and similarly in the flowcharts presented in LR I-220).

(b) For purposes of the original activity sampling data collection, the intent of collecting data was to categorize time proportions (i.e., instants of time) into the general sets of activities described by the rectangles and circles in Appendix A.

(c) Numerous specific carrier activities can be encompassed within each of the general sets of activities described by the rectangles and circles in Appendix A (for example, according to your response to MPA/USPS-T13-109, the Appendix A term, "Load Vehicle," includes moving full hampers/containers from unit across dock to vehicle, physically moving mail from hampers/containers into vehicle, rearranging mail/containers within vehicle, moving empty hampers/containers from vehicle, across dock, and back to unit; the Appendix A term, "Drive to Park Point,"

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includes any driving for any delivery type except driving among curblane deliveries).

(d) Although the data collectors took "snapshots" of carrier activity being observed, the codes used to describe those "snapshots" were designed to categorize each snapshot into one of the general sets of activities (represented by either one of the rectangles or one of the circles in Appendix A).

**RESPONSE:**

- (a) Not precisely. The list of activities and hierarchy to which I refer on page 6 are the basic steps that were followed to create the data collection hierarchy for programming the TimeWand II scanners. Appendix A on page 17 of my testimony is a flow chart showing the basic delivery patterns of a city delivery carrier. Appendix A was one of many materials used to develop the data collection hierarchy prior to programming the scanners. The flowcharts presented in LR I-220 are other materials used to develop the data collection hierarchy, and were, in fact developed prior to the creation of Appendix A. Pages 10 and 11 of my testimony describe the data collection procedure as it transpired following the programming of the scanners.
- (b) Not confirmed. For purposes of the original activity sampling data collection, the intent of collecting data was to determine the percentage distributions of time spent at various locations, determine percent time spent inside versus outside, develop delay percentages for inside and outside activities, develop a set of engineered standards based on work sampling and other data, and other purposes.

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(c) Partially confirmed, in that numerous specific carrier activities can be encompassed within each of the general sets of activities described by the rectangles and circles in Appendix A. In my response to MPA/USPS-T13-109, I identified only two tallies out of the 844 route days of data given to Witness Baron that involved "In Unit Walking", and in my response I did not state that the Appendix A term, "Load Vehicle," includes moving full hampers/containers from unit across dock to vehicle, physically moving mail from hampers/containers into vehicle, rearranging mail/containers within vehicle, moving empty hampers/containers from vehicle, across dock, and back to unit. In fact, "Load Vehicle" may contain other activities in addition to those mentioned in your question. In my response, I also did not state that the Appendix A term, "Drive to Park Point," includes any driving for any delivery type except driving among curblane deliveries and driving to a DM – Dismount Point. However, the use of the work sampling hierarchy provided additional driving information to assist in defining the intent of the travel. In fact, "Drive to Park Point" may contain other activities in addition to those mentioned in your question.

(d) Not confirmed. The codes used to describe the "snapshots" were designed to represent many different characteristics of a single moment in time relating to the location, activity, etc. of the carrier at that moment. Some of these characteristics were intended to be combined to present an overall picture of the carrier's activity. The codes were not designed to map onto Appendix A. The

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rectangles and circles in Appendix A are not suitable to all of the goals of the  
work sampling data collection.

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**ADVO/USPS-T13-112.** In response to MPA/USPS-T13-57, you state that, when the 6-minute beep occurred, the observer took an instant snapshot of the carrier's activity and scanned in the observation as soon as possible. Please confirm the following or provide a correction.

(a) With the exception of L18 (In Unit Walking), none of the Level 10 Location codes indicate specific physical actions on the part of the carrier – only that carrier actions occurred at these locations at the instants of time being observed.

(b) None of the Level 11.1 (Personal or Administrative), Level 11.2 (Delivery Type), or Level 11.3 (Delivery Type Status) codes, provided in LR I-163, indicate specific physical actions on the part of the carrier at the instants of time being observed.

(c) The D01 (No Access to Box), D02 (Vehicle Breakdown), D04 (Weather), D05 (Traffic/Detour), D06 (No Work), D08 (Delay Specify) activity codes do not indicate specific physical actions on the part of the carrier – only that these conditions were somehow associated with a carrier activity at the instants of time being observed.

(d) The F03 (Hardship), F04 (Delay-Specify) activity codes do not indicate specific physical actions on the part of the carrier - only that a hardship service or delay was somehow associated with a carrier activity at the instants of time being observed.

(e) The F01 (Accountable), F02 (Parcel), J04 (Parcels), and J06 (Mix) activity codes do not indicate specific physical actions on the part of the carrier - only that accountable, parcel, parcels, or mix of mail was somehow associated with a carrier activity at the instants of time being observed.

(f) The T00-T04 Travel activity codes do not indicate, by themselves, how the carrier was physically moving or, even, whether the carrier was actually moving.

**RESPONSE:**

(a) Confirmed. As stated in my testimony on page 10, lines 17 and 18, Level 10 Location codes are used to indicate *where* a carrier is when the tone signals. Level 10 Location codes are not intended to capture specific physical carrier actions by themselves. However, a Level 10 Location

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code scanned in combination with the additional 5 Levels of codes (Level 11.1, 11.2, 11.3, 11.4, and 11.4.1) could add additional insight into what carrier activity is taking place at the instant of time being observed.

- (b) Confirmed. Level 11.1 (Personal or Administrative), Level 11.2 (Delivery Type), and Level 11.3 (Delivery Type Status) codes are not intended to capture specific physical carrier actions by themselves. However, the Level 11.1, 11.2, and 11.3 codes, scanned in combination with the additional Levels of codes (Levels 10, 11.1, 11.2, 11.3, 11.4, 11.4.1), could add additional insight into what carrier activity is taking place at the instant of time being observed.
- (c) Confirmed. The D01, D02, D04, D05, D06, and D08 codes are not intended to capture specific physical carrier actions by themselves. However, scanning these codes (D01, D02, D04, D05, D06, or D08) in combination with other Levels of codes (Level 11.1, 11.2, 11.3, 11.4, and 11.4.1) may yield additional insight into what carrier activity is taking place at the instant of time being observed.
- (d) Confirmed. The F03 and F04 codes are not intended to capture specific physical carrier actions by themselves. However, scanning these codes (F03 or F04) in combination with other Levels of codes (Level 11.1, 11.2, 11.3, 11.4, and 11.4.1) may yield additional insight into what carrier activity is taking place at the instant of time being observed.
- (e) Confirmed. The F01, F02, J04, and J06 codes are not intended to capture specific physical carrier actions by themselves. However, scanning these

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codes (F01, F02, J04, or J06) in combination with other Levels of codes (Level 11.1, 11.2, 11.3, 11.4, and 11.4.1) yields additional insight into what carrier activity is taking place at the instant of time being observed.

- (f) Confirmed. The T00-T04 codes, by themselves, are not intended to capture how the carrier was moving or whether the carrier was moving. By and large, however, use of these codes (T00-T04) in combination with other Levels of codes (Level 11.1, 11.2, 11.3, 11.4, and 11.4.1) can be expected to indicate movement and yield additional insight into what carrier activity is taking place at the instant of time being observed.

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**ADVO/USPS-T13-113. With respect to the 933 video tapes mentioned in MPA/USPS-T13-58:**

- (a) Were tapes made of the entire route day for some or all routes? Please explain how much time was taped per day on average.**
- (b) Please confirm that one of the observers on the team of two observers always took the videotape.**
- (c) The number of videotapes exceeds the number of route-days. Please explain.**

**RESPONSE:**

- (a) No, tapes were not made of the entire route day for any routes. Refer to my response to ADVO/USPS-T13-11(b) which indicates the data collectors "would videotape the case layout and inside activities for approximately ½ hour. The video would be shot at various times throughout the in-office time," and the data collectors "would videotape outside activities for approximately ½ hour. The video would be shot at various times throughout the street time."**
- (b) To the extent that videotaping occurred, the taping may have been performed by one of the observers, the Subject Matter Expert, the Quality Assurance person, or any other individual associated with the project that may have been present.**
- (c) In reference to the number of videotapes, if you mean the route days in LR-I-163, it should be understood that the tapes were used in a variety of different capacities throughout the duration of the study. Videotapes were made for purposes other than studying routes that are included in LR-I-**

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163, including a bicycle route study, curb delivery study, tray study, and case study. Additionally, the difference in number of tapes and number of route days in LR-I-163 represents those routes that were not included in the data presented to witness Baron. Note also that approximately 48 videotapes include more than one route day. Thus, the number of videotapes and route-days will not match exactly. Refer to the responses to ADVO/USPS-T13-63(v) and ADVO/USPS-T13-32(a-iii) for additional explanations of data not included in LR-I-163.

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**ADVO/USPS-T13-115. MPA/USPS-T13-60 requests identification of data collectors which had previous experience (in projects other than the one in which the activity sampling data were collected) in observing postal delivery carriers for purposes of identifying specific activities. Your response states that OBS12 and OBS13 had collected data with the scanner on other non-postal clients.**

**(a) Were OBS12 and OBS13 the only data collectors that had scanner experience on other than this project?**

**(b) Did any of the other data collectors have experience in observing postal delivery carriers for purposes of identifying or measuring specific carrier activities? If so, please identify each individual by observer code and provide a brief description of his experience.**

**RESPONSE:**

**(a) Yes.**

**(b) No.**

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**ADVO/USPS-T13-118.** In response to MPA/USPS-T13-61 and 52, you state that "the oral instructions provided to the observers" on how to identify and distinguish among the Level 10 Location codes "are as shown in Appendix D to my testimony." On page 26, Appendix D, you state that Location Code L09, Park Point, is "the point where the vehicle is parked on Park and Loop routes." However, on page 17, Appendix A, you show "Park Points" for Central Inside, Central Outside, Dismount, and Park and Loop routes. There also appear to be Park Point locations for non-Park and Loop routes in the LR I-163 database. Despite the Appendix D definition, please confirm that your data collectors scanned the Park Point L09 code when the carrier parked at many different locations and not just on loops. If you cannot, please explain why not.

**RESPONSE:**

Confirmed. Please note that the response to MPA/USPS-T13-52 does not relate to the use of Park Point L09 Code. Note also the response to MPA/USPS-T13-61 explains that LR-I-220 contains pictures of various postal items and oral instructions were provided to the observers as shown in Appendix D of my testimony. Appendix D of my testimony was not intended to be a set of all-encompassing definitions of location codes, but only to give very general insight as to the location.

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**ADVO/USPS-T13-120.** Your response to MPA/USPS-T13-65 indicates that, based on USPS 3999X delivery types, when moving from one kind of delivery type/status to another kind of delivery type/status, the observer would change the delivery type when traveling to the next (new) delivery type/status. MPA/USPS-T13-69(c) and (d) requested all systematic guidance given to the data collectors on how to identify delivery type and delivery type status when the carrier was not at the point of delivery. For the following, please provide your best belief and understanding. If you do not know the answer, please so state. If no instructions were given, please so state.

**(a)** For all carrier activities prior to the first delivery of the day, did the observers scan the delivery type/status for the first possible (as opposed to actual) delivery of the day? Please explain,

**(b)** For all carrier activities after the last delivery of the day, did the observers scan the delivery type/status for the last possible (as opposed to actual) delivery of the day? Please explain.

**(c)** If a delivery was typically curblane but, on the observed route-day, a parcel or accountable had to be dropped to the address, were the data collectors instructed to scan curblane type (with either outside residential or business status) or to scan dismount (with inside residential or business status)? Please explain.

**(d)** If a delivery was typically central, park & loop, or foot, and the delivery status was typically outside residential or business, but on the observed route-day, a parcel or accountable had to be dropped to the address, were the data collectors instructed to scan outside residential or business or inside residential or business? Please explain.

**(e)** In response to MPA/USPS-T13-91, you confirm that there are no tallies allocating Curblane Delivery type to Drive Time. In response to MPA/USPS-T13-92 you confirm that the observers could tell when a curblane set of deliveries was coming up. Do these facts mean that, on the observed routes, curblane deliveries always preceded other motorized delivery types and the observed carriers never drove from another delivery type to a curblane set of deliveries? Please explain.

**RESPONSE:**

As indicated in response to MPA/USPS-T13-69 (c-e), the observer's choice for delivery type and delivery type status was based on the USPS Form 3999x.

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Based on this form, the observer choose the code for either the delivery the carrier was servicing or the next delivery the carrier was traveling to.

- (a) In general, the observers correctly scanned the delivery type/status for the first possible delivery point based on the USPS Form 3999x for all the outside sampling scans prior to the first delivery. The delivery type/status scans after the first delivery point were based on the actual delivery and the USPS Form 3999x as a guideline. If the actual delivery point did not match the USPS Form 3999x, the collector was to note the change for a database update. In a few cases, the N/A Code was scanned.
- (b) Generally, the delivery type/status for the last delivery was correctly scanned for the remaining outside work sampling scans. In a few cases, the N/A Code was scanned.
- (c) For a parcel delivery on a curb line route, the observation at the time of the six-minute work sampling beep would be scanned as dismount if the carrier had dismounted the vehicle and walked to the delivery point. The observer would scan Curb line delivery if the carrier remained at the vehicle and could fit the parcel into the receptacle or hand it to the customer waiting at the receptacle. If the parcel point of delivery was inside then inside residential or business would be recorded. If the parcel point of delivery was outside, then outside residential or business would be recorded.

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For an accountable delivery on a curb line route, the observation at the time of the six-minute work sampling beep would be scanned as dismount if the carrier dismounted the vehicle and walked to the delivery point. The observer would scan Curb line delivery if the carrier remained at the vehicle and handed the accountable to the customer waiting at the receptacle. If the accountable point of delivery was inside then inside residential or business would be recorded. If the accountable point of delivery was outside, then outside residential or business would be recorded.

(d) If the parcel or accountable was to be dropped inside, then inside residential or business would be recorded. If the parcel or accountable was to be dropped outside then outside residential or business would be recorded.

(e) As I stated in my response to MPA/USPS-T13-92, "the observers had the USPS Form 3999x that lists the entire route with delivery types by delivery point." If your question means that curblines deliveries always preceded other motorized delivery type (such as dismount) and the observed carriers never drove from another delivery type (such as park and loop), then no, these facts do not mean that is the case. Curblines deliveries can occur throughout the route. Park and loops can occur prior to or after curblines deliveries. The carrier would drive from the park point to the first curblines delivery. The carrier can also drive from the last curblines delivery to a park point. The curblines deliveries are identified on the USPS Form 3999x.

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**ADVO/USPS-T13-121.** In response to MPA/USPS-T13-74(c), you state that Level 11.4 Activity code F01 (Accountable) means that the carrier is handling, delivering, or processing an accountable type of mail.

**(a)** Please confirm that F01 does not necessarily mean that the carrier was preparing mail to place into a mail receptacle, inserting mail into a receptacle or handing mail to an addressee at the observed instant of time. If you cannot, please explain why not.

**(b)** Please confirm that "delivering" as used in your statement is used broadly in the sense that the carrier intends to get the accountable to the addressee and does not mean physically placing the accountable in the addressee's hands or mail receptacle. If you cannot, please explain why not.

**RESPONSE:**

**(a)** Confirmed. As stated in MPA/USPS-T13-74 (c), the physical action generally observed for the F01 (accountable) code is, "the carrier handling, delivering or processing an accountable type of mail." These actions include, in addition to the activities described in your question, completing the form and waiting for the customer.

**(b)** Confirmed.

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**ADVO/USPS-T13-122. In response to MPA/USPS-T13-75(c), you state that Level 11.4 Activity Code F02 (Parcel) means that the carrier is handling, delivering, or processing a parcel type of mail.**

**(a) Please confirm that F02 does not necessarily mean that the carrier was preparing mail to place into a mail receptacle, inserting mail into a receptacle, or handing mail to an addressee at the observed instant of time. If you cannot, please explain why not.**

**(b) Please confirm that "delivering" as used in your statement is used broadly in the sense that the carrier intends to get the accountable to the addressee and does not mean physically placing the parcel in the addressee's hands or mail receptacle. If you cannot, please explain why not.**

**RESPONSE:**

**(a) Confirmed. As stated in MPA/USPS-T13-75 (c), the physical action generally observed for the F02 (parcel) code is, "the carrier handling, delivering or processing a parcel type of mail." These actions include, in addition to the activities described in your question, completing the form, waiting for the customer.**

**(b) Confirmed.**

## DECLARATION

I, Lloyd B. Raymond, declare under penalty of perjury that the foregoing answers are true and correct to the best of my knowledge, information, and belief.

Lloyd B. Raymond

Date: 5-18-00

## CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

  
Richard T. Cooper

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May 18, 2000